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Title: Planning is Key for Storm Water Regulatory Compliance

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Planning is Key for Storm Water Regulatory Compliance

- Most construction projects at LANL are subject to a EPA regulated storm water discharge permit (NPDES Construction General Permit)
 - Compliance is assessed by Triad through regular site inspections
- Each identified non-compliance is a regulatory liability to both the subcontractor & Triad
 - Non-compliance can result in regulatory enforcement such as fines, penalties, and stop work
- In FY 2020, LANL had 26 non-compliances from subcontractor projects



Plan Ahead

- Almost all compliance issues occur due to failure to plan ahead!
 - Failure to implement corrective actions within permit timeframes due to lack of planning and preparedness - **#1 reason for non-compliance**
 - Use of improper or inadequate materials and methods
 - Projects aren't prepared to initiate stabilization when soil disturbance ceases
 - Projects don't adequately schedule storm water requirements into project activities
 - ***Project personnel operate reactively instead of proactively to environmental requirements***



How To Be Successful

- Include environmental requirements in project planning activities
- Include environmental requirements in your schedule of activities
- Complete the compliance requirements identified in your EXID/PRID
- **Be proactive – not reactive!**
- Learn the requirements & make plans to comply with them
- Contact the Storm Water Team within the Compliance Programs Group (EPC-CP) if you don't understand the requirements or if you need help!

